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6 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

7

8 UNITED STATES OF AMERICA, ) 2:15-cr-0173-APG-PAL  
9 Plaintiff, )  
10 v. ) STIPULATION FOR  
11 WILLIAM HATLEY, ) PROTECTIVE ORDER  
12 Defendants. )  
13 \_\_\_\_\_ )

14 IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden,  
15 United States Attorney for the District of Nevada, and Kimberly M. Frayn, Assistant United  
16 States Attorney, counsel for the United States, Brian Pugh, counsel for defendant William  
17 Hatley, that this Court issue an Order protecting from disclosure to the public any discovery  
18 documents containing the personal identifying information such as social security numbers,  
19 drivers' license numbers, dates of birth, or addresses, of participants, witnesses and victims in  
20 this case. Such documents shall be referred to hereinafter as "Protected Documents." The  
21 parties state as follows:

22 1. Protected Documents which will be used by the government in its case in chief  
23 include personal identifiers, including social security numbers, drivers' license numbers, dates of  
birth, and addresses, of participants, witnesses, and victims in this case.

1  
2        2. Discovery in this case is estimated to be a few hundred pages in length. Given the  
3 nature of the allegations and the facts and circumstances surrounding the crimes with which the  
4 defendant is charged, that is, that the defendant assumed approximately 11 identities of persons  
5 other than himself, and obtained identity documents bearing the defendant's photograph in the  
6 victims' names and personal identifiers, many of the documents in the discovery necessarily  
7 include personal identifiers. Redacting the personal identifiers of participants, witnesses, and  
8 victims would prevent the timely disclosure of discovery to defendant.

9        3. The United States agrees to provide Protected Documents without redacting the  
10 personal identifiers of participants, witnesses, and victims.

11        4. Access to Protected Documents will be restricted to persons authorized by the  
12 Court, namely defendant, attorney(s) of record and attorneys' paralegals, investigators, experts,  
13 and secretaries employed by the attorney(s) of record and performing on behalf of defendant.

14        5. The following restrictions will be placed on defendant, defendant's attorney(s)  
15 and the above-designated individuals unless and until further ordered by the Court. Defendant,  
16 defendant's attorneys and the above-designated individuals shall not:

17            a. make copies for, or allow copies of any kind to be made by any other person of  
18 Protected Documents;

19            b. allow any other person to read Protected Documents; and

20            c. use Protected Documents for any other purpose other than preparing to defend  
21 against the charges in the Indictment or any further superseding indictment arising out of this  
22 case.

1       6. Defendant's attorney(s) shall inform any person to whom disclosure may be made  
2 pursuant to this order of the existence and terms of this Court's order.

3       7. The requested restrictions shall not restrict the use or introduction as evidence of  
4 discovery documents containing personal identifying information such as social security  
5 numbers, drivers' license numbers, dates of birth, and addresses during the trial of this matter.

6       8. Upon conclusion of this action, defendant's attorney(s) shall return to government  
7 counsel or destroy and certify to government counsel the destruction of all discovery documents  
8 containing personal identifying information such as social security numbers, drivers' license  
9 numbers, dates of birth, and addresses within a reasonable time, not to exceed thirty days after  
10 the last appeal is final.

11           DANIEL G. BOGDEN  
12           United States Attorney

13           /s/ Kimberly M. Frayn \_\_\_\_\_  
14           KIMBERLY M. FRAYN  
15           Assistant United States Attorney

July 1, 2015  
DATE

16           /s/ Brian Pugh \_\_\_\_\_  
17           BRIAN PUGH  
18           Assistant Federal Public Defender  
19           Counsel for defendant HATLEY

July 1, 2015  
DATE

**ORDER**

IT IS SO ORDERED this 14th day of July, 2015.

  
UNITED STATES DISTRICT/MAGISTRATE COURT JUDGE